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October 17, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: MM Docket No. 95-135

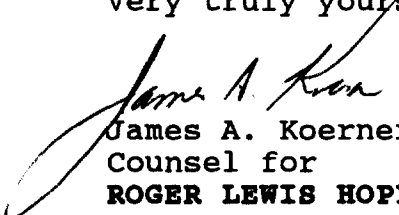
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Dear Mr. Caton:

On behalf of Roger Lewis Hoppe II, there are transmitted herewith an original and four copies of his Comments in the above-referenced rulemaking proceeding proposing the allotment of FM Channel 264A at Honor, Michigan.

Should additional information be necessary in connection with this matter, please communicate with this office.

Very truly yours,


James A. Koerner
Counsel for
ROGER LEWIS HOPPE II

Enclosures

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of

**Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Honor, Michigan)**

**MM Docket No. 95-135
RM - 8681**

**TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau**

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COMMENTS

Roger Lewis Hoppe II ("Hoppe"), by its attorneys, hereby submits his Comments in the above-captioned proceeding pursuant to the Notice of Proposed Rule Making released August 28, 1995. In response to the Notice, the following is submitted:

1. Hoppe is the licensee of Radio Station WZTU, Bear Lake, Michigan. This station currently operates on Channel 261A. Pursuant to the provisions of Sections 73.203 and 73.3573, Hoppe is concurrently filing an application for a one-step upgrade to specify operation on Channel 264C2. This application is mutually exclusive with the proposal to allot Channel 264A to Honor, Michigan, and thus constitutes a counterproposal.

2. As the Commission noted in the Notice, although Honor is incorporated, and is listed in the 1990 Census, it is a population grouping of a mere 292 people. Despite the fact that the allotment of Channel 264 would provide Honor with a first transmission service, the upgrade proposed in the WZTU application

will provide service to a far greater number of people. Further, another frequency, Channel 224 could be allotted to Mesick as a first service to that community, providing city grade service to Honor as well. Grant of the WZTU upgrade and an allotment to Mesick would be a far more effective utilization of the spectrum. Hoppe is certain that the proponent of the Honor rulemaking, who claims a Mesick address, would be just as willing to apply for and establish a station in Mesick as in Honor.

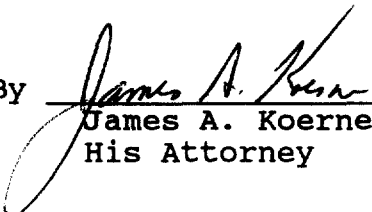
Accordingly, it is respectfully submitted that the Channel 264C2 upgrade application for Station WZTU, be granted as a counterproposal to the allotment of Channel 264A at Honor, Michigan.

Respectfully submitted,

ROGER LEWIS HOPPE II

Date: October 17, 1995

By


James A. Koerner
His Attorney

BARAFF, KOERNER, OLENDER
& HOCHBERG, P.C.
Three Bethesda Metro Center
Suite 640
Bethesda, Maryland 20814

CERTIFICATE OF SERVICE

I, Linda M. Blair, a secretary in the law offices of Baraff, Koerner, Olender & Hochberg, P.C., do hereby certify that copies of the foregoing "Comments," was served this 17th day of October, 1995, via first class mail, postage prepaid upon the following:

Ms. Jacqueline F. Bourgard
P.O. Box 365
Mesick, Michigan 49668


Linda M. Blair